

JAJ:JPL/MA
F.# 2008R01587

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

Cr. No. _____

RICHARD LUGO,

also known as "Double R,"

EDWARD CARTER,

also known as "Sadat," and

KORLEY OKAI,

also known as "Kool-Aid,"

(T. 21, U.S.C., §§
841(a)(1),
841(b)(1)(A)(iii),
841(b)(1)(C) and 846;
T. 18, U.S.C., §§ 2
and 3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Distribute Cocaine Base)

In or about and between June 2007 and October 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RICHARD LUGO, also known as "Double R," EDWARD CARTER, also known as "Sadat," and KORLEY OKAI, also known as "Kool-Aid," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Distribution of Cocaine Base)

On or about June 12, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE
(Distribution of Cocaine Base)

On or about June 13, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR
(Distribution of Cocaine Base)

On or about June 18, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIVE
(Distribution of Cocaine Base)

On or about June 20, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIX
(Distribution of Cocaine Base)

On or about June 21, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVEN
(Distribution of Cocaine Base)

On or about July 5, 2007, within the Eastern District of New York, the defendant EDWARD CARTER, also known as "Sadat," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT
(Distribution of Cocaine Base)

On or about July 10, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT NINE
(Distribution of Cocaine Base)

On or about July 11, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TEN
(Distribution of Cocaine Base)

On or about July 17, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and EDWARD CARTER, also known as "Sadat," did knowingly and

intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN
(Distribution of Cocaine Base)

On or about July 17, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWELVE
(Distribution of Cocaine Base)

On or about July 24, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTEEN
(Distribution of Cocaine Base)

On or about July 27, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOURTEEN
(Distribution of Cocaine Base)

On or about July 27, 2007, within the Eastern District of New York, the defendant EDWARD CARTER, also known as "Sadat," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTEEN
(Distribution of Cocaine Base)

On or about August 3, 2007, within the Eastern District of New York and elsewhere, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIXTEEN
(Distribution of Cocaine Base)

On or about August 8, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTEEN
(Distribution of Cocaine Base)

On or about August 15, 2007, within the Eastern District of New York and elsewhere, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT EIGHTEEN
(Distribution of Cocaine Base)

On or about August 16, 2007, within the Eastern District of New York and elsewhere, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally

distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT NINETEEN
(Distribution of Cocaine Base)

On or about August 29, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY
(Distribution of Cocaine Base)

On or about August 30, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-ONE
(Distribution of Cocaine Base)

On or about September 5, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-TWO
(Distribution of Cocaine Base)

On or about September 6, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," EDWARD CARTER, also known as "Sadat," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally

distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-THREE
(Distribution of Cocaine Base)

On or about September 6, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-FOUR
(Distribution of Cocaine Base)

On or about September 13, 2007, within the Eastern District of New York and elsewhere, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally

distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-FIVE
(Distribution of Cocaine Base)

On or about September 13, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-SIX
(Distribution of Cocaine Base)

On or about September 20, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," together with others, did knowingly and intentionally

distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-SEVEN
(Distribution of Cocaine Base)

On or about September 26, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-EIGHT
(Distribution of Cocaine Base)

On or about September 27, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY-NINE
(Distribution of Cocaine Base)

On or about October 3, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY
(Distribution of Cocaine Base)

On or about October 9, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-ONE
(Distribution of Cocaine Base)

On or about October 17, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-TWO
(Distribution of Cocaine Base)

On or about October 18, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-THREE
(Distribution of Cocaine Base)

On or about October 23, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTY-FOUR
(Distribution of Cocaine Base)

On or about November 2, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-FIVE
(Distribution of Cocaine Base)

On or about November 8, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-SIX
(Distribution of Cocaine Base)

On or about November 21, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-SEVEN
(Distribution of Cocaine Base)

On or about November 21, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-EIGHT
(Distribution of Cocaine Base)

On or about November 29, 2007, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-NINE
(Distribution of Cocaine Base)

On or about December 11, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY
(Distribution of Cocaine Base)

On or about December 12, 2007, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to

distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FORTY-ONE
(Distribution of Cocaine Base)

On or about December 21, 2007, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-TWO
(Distribution of Cocaine Base)

On or about January 2, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-THREE
(Distribution of Cocaine Base)

On or about January 4, 2008, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and EDWARD CARTER, also known as "Sadat," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FORTY-FOUR
(Distribution of Cocaine Base)

On or about January 10, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-FIVE
(Distribution of Cocaine Base)

On or about January 11, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-SIX
(Distribution of Cocaine Base)

On or about January 17, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-SEVEN
(Distribution of Cocaine Base)

On or about January 31, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-EIGHT
(Distribution of Cocaine Base)

On or about February 6, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY-NINE
(Distribution of Cocaine Base)

On or about February 8, 2008, within the Eastern District of New York, the defendants RICHARD LUGO, also known as "Double R," and EDWARD CARTER, also known as "Sadat," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIFTY
(Distribution of Cocaine Base)

On or about February 11, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-ONE
(Distribution of Cocaine Base)

On or about February 15, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-TWO
(Distribution of Cocaine Base)

On or about February 18, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-THREE
(Distribution of Cocaine Base)

On or about February 20, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-FOUR
(Distribution of Cocaine Base)

On or about March 3, 2008, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-FIVE
(Distribution of Cocaine Base)

On or about March 7, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-SIX
(Distribution of Cocaine Base)

On or about March 10, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-SEVEN
(Distribution of Cocaine Base)

On or about March 13, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-EIGHT
(Distribution of Cocaine Base)

On or about March 20, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FIFTY-NINE
(Distribution of Cocaine Base)

On or about March 27, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY
(Distribution of Cocaine Base)

On or about April 2, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-ONE
(Distribution of Cocaine Base)

On or about April 14, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-TWO
(Distribution of Cocaine Base)

On or about April 16, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-THREE
(Distribution of Cocaine Base)

On or about April 21, 2008, within the Eastern District of New York, the defendant KORLEY OKAI, also known as "Kool-Aid," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-FOUR
(Distribution of Cocaine Base)

On or about April 29, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-FIVE
(Distribution of Cocaine Base)

On or about May 14, 2008, within the Eastern District of New York, the defendant EDWARD CARTER, also known as "Sadat," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-SIX
(Distribution of Cocaine Base)

On or about May 22, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-SEVEN
(Distribution of Cocaine Base)

On or about May 28, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-EIGHT
(Distribution of Cocaine Base)

On or about June 13, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIXTY-NINE
(Distribution of Cocaine Base)

On or about June 16, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY
(Distribution of Cocaine Base)

On or about July 9, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-ONE
(Distribution of Cocaine Base)

On or about July 18, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVENTY-TWO
(Distribution of Cocaine Base)

On or about July 30, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-THREE
(Distribution of Cocaine Base)

On or about August 13, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-FOUR
(Distribution of Cocaine Base)

On or about August 18, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-FIVE
(Distribution of Cocaine Base)

On or about August 27, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-SIX
(Distribution of Cocaine Base)

On or about September 5, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and

possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVENTY-SEVEN
(Distribution of Cocaine Base)

On or about September 8, 2008, within the Eastern District of New York, the defendant RICHARD LUGO, also known as "Double R," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

A TRUE BILL

FOREPERSON

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: Paul Shoen
ACTING UNITED STATES ATTORNEY
PURSUANT TO 23 C.F.R. O.136

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

1. Title of Case: United States v. Richard Lugo, et al.
2. Related Magistrate Docket Number(s)
3. Arrest Date: N/A
4. Nature of offense(s): Felony
 Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()
7. County in which crime was allegedly committed: Kings
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment/information been ordered sealed? (X) Yes () No
9. Have arrest warrants been ordered? (X) Yes () No

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
By: 
James P. Loonam
Assistant U.S. Attorney
718-254-7520